

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

UNITED STATES OF AMERICA )  
Plaintiff )  
v. ) No. 3:22-CR-024  
VICTOR BTESH, ) JUDGES CRYTZER/  
MICHELLE'S DVD FUNHOUSE, INC., ) POPLIN  
MJR PRIME, LLC, )  
PRIME BROOKLYN, LLC ) MOTION TO FILE UNDER SEAL  
Defendants )

**MOTION OF DEFENDANT VICTOR BTESH  
FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Come now Defendant, Victor Btesh, through undersigned counsel, pursuant to Rule 12.2 of the Electronic Case Filing Rules and Procedures of the United States District Court for the Eastern District of Tennessee, and moves for leave to have the proposed documents (and those pages of Defendant Btesh's Sentencing Memorandum that discuss the documents) filed under seal due to the sensitive information contained therein, including but not limited to personal identifiable information, and identities of unindicted conspirators.

Undersigned counsel will provide copies to counsel for the Government and to the U.S. Probation Office.

Respectfully submitted this 11<sup>th</sup> day of July, 2023.

/s/ Donald A. Bosch  
Donald A. Bosch (BPR No. 013168)  
Ann C. Short (BPR No. 009645)

**THE BOSCH LAW FIRM**  
712 South Gay Street  
Knoxville, TN 37902  
(865) 637-2142

*Counsel for Victor Btesh*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 11, 2023, the foregoing was filed electronically, using the CM/ECF system, which will send a notice of electronic filing to all parties indicated on the electronic filing receipt.

*/s/ Donald A. Bosch*  
\_\_\_\_\_  
DONALD A. BOSCH